

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

PAMELA T. JOHANN (CABN 243695)
Chief, Civil Division

DAVID M. DEVITO (CABN 243695)
Assistant United States Attorney
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7332
Facsimile: (415) 436-6748
david.devito@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

AMERICAN CIVIL LIBERTIES UNION,

Plaintiff,

v.

UNITED STATES IMMIGRATION AND
CUSTOMS ENFORCEMENT, et al.,

Defendants.

Case No. 4:23-cv-03450-DMR

**JOINT STATUS REPORT AND
STIPULATION TO EXTEND TIME**

Pursuant to the Court's October 16, 2024 Order (ECF No. 65), Plaintiff American Civil Liberties Union ("Plaintiff") and Defendants United States Immigration and Customs Enforcement and United States Department of Homeland Security ("Defendants"), by and through their counsel, hereby submit the following Joint Status Report:

On October 25, 2024, Plaintiff provided Defendants with information regarding Plaintiff's claim for attorney's fees and costs. Defendants are in the process of analyzing that information and obtaining approvals to enter into negotiations to attempt to resolve Plaintiff's claim for attorney's fees and costs. Defendants will respond in writing to Plaintiff on or before December 5, 2024. The parties agree that

1 additional time is necessary so that they can attempt to resolve Plaintiff's claim for attorney's fees and
 2 costs without the need for further litigation. The parties believe that continuing the meet-and-confer
 3 process for this additional period is likely to be productive in further narrowing the issues, and could
 4 potentially eliminate the need for further Court involvement.

5 Based upon the foregoing, pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, the parties further
 6 stipulate and agree to extend time to submit a proposed briefing schedule on Plaintiff's motion for
 7 attorney's fees and costs to December 19, 2024. The requested modification will not impact the
 8 schedule for the case because no further schedule has been set. In support of this stipulation, Defendants
 9 also submit the attached declaration of David DeVito, as required by Local Rule 6-2(a).

10 DATED: November 21, 2024

Respectfully submitted,

11 ISMAIL J. RAMSEY
 12 United States Attorney

13 /s/ David M. DeVito*
 14 DAVID M. DEVITO
 Assistant United States Attorney

Attorneys for Defendants

15 DATED: November 21, 2024

16 AMERICAN CIVIL LIBERTIES UNION
 FOUNDATION

17 /s/ Marisol Dominguez-Ruiz
 18 Eunice Cho
 19 echo@aclu.org
 Kyle Virgien
 20 kvirgien@aclu.org
 Marisol Dominguez-Ruiz
 mdominguez-ruiz@aclu.org

Attorneys for Plaintiff

22 AMERICAN CIVIL LIBERTIES UNION
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28 * In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty
 of perjury that concurrence in the filing of this document has been obtained from the other Signatory.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. Defendants shall provide Plaintiff with a response to Plaintiff's claim for attorneys' fees and costs by December 5, 2024. The parties shall submit a further joint status report including a proposed briefing schedule for Plaintiff's motion for attorney's fees and costs on December 19, 2024.

DATE:

The Honorable Donna M. Ryu
United States Chief Magistrate Judge